



Data Protection Policy - KitchenJam

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1. Purpose

KitchenJam is committed to protecting the privacy, confidentiality and security of personal information.

This policy sets out how KitchenJam collects, uses, stores, shares and disposes of personal data, and how we meet our responsibilities under UK data protection law.

KitchenJam will comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and other relevant data protection and privacy legislation.

2. Scope

This policy applies to personal data relating to:

- students and prospective students;
- children and young people;
- parents, carers and emergency contacts;
- customers and people making enquiries;
- staff, apprentices, volunteers, contractors and job applicants;
- visitors and event attendees; and
- any other individual whose personal data KitchenJam processes.

It applies to personal data held electronically, on paper, in photographs or recordings, or in any other form.

This policy should be read alongside KitchenJam's Website Privacy Policy, Safeguarding Policy and any other relevant policies or privacy information.

3. Data Controller and Responsibility

Guitar Tuition East London Ltd, trading as KitchenJam, is the data controller for personal data where it determines how and why that information is used.

KitchenJam management is responsible for making sure appropriate data protection procedures are in place.

A designated **Data Protection Lead** will oversee day-to-day data protection matters, including:

- supporting staff with data protection questions;
- dealing with requests relating to personal data;
- maintaining appropriate records;
- coordinating responses to personal data breaches; and
- reviewing data protection practices and this policy.

Everyone working for or on behalf of KitchenJam is responsible for handling personal data appropriately and reporting any concerns or suspected breaches promptly.

4. Data Protection Principles

KitchenJam will follow the data protection principles set out in the UK GDPR.

Personal data will be:

- processed lawfully, fairly and transparently;
- collected for specified and legitimate purposes and not used incompatibly with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up to date where necessary;
- kept for no longer than necessary;
- protected using appropriate security measures; and
- handled in a way that allows KitchenJam to demonstrate compliance with its data protection responsibilities.

These principles apply throughout the lifecycle of personal data, from collection through to deletion or disposal.

5. Personal Data We May Process

Depending on the individual and their relationship with KitchenJam, personal data may include:

Students and Prospective Students

- name and contact details;
- age and date of birth;
- parent or carer details;
- emergency contact information;
- attendance and lesson history;
- membership, booking and timetable information;
- lesson notes and information relating to learning or progress;
- relevant medical, accessibility or support information;
- correspondence and enquiries;
- safeguarding information where necessary; and
- photographs or video recordings where applicable.

Parents, Carers and Customers

- name and contact details;
- relationship to a child;
- correspondence and enquiries;
- booking and membership information; and
- payment and transaction information.

Staff, Apprentices, Volunteers and Contractors

This may include:

- contact and emergency contact information;
- recruitment and employment records;
- references and qualifications;
- right-to-work information;
- DBS and suitability information where applicable;
- payroll and payment information;
- training records;
- performance and employment records; and
- relevant health, absence or support information.

Financial Information

KitchenJam may hold invoices, transaction records and other information required to manage payments and accounts.

Where payments are processed through an external payment provider, payment card information may be handled directly by that provider rather than stored by KitchenJam.

Website and Digital Information

Information collected through KitchenJam's website, online forms and digital services is handled in accordance with our Website Privacy Policy.

6. How and Why We Use Personal Data

KitchenJam will only process personal data where there is a lawful basis for doing so.

Different lawful bases may apply to different activities.

These may include:

- **Contract:** where processing is necessary to provide lessons, memberships, bookings or other services, or to meet obligations under a contract with an individual.
- **Legal obligation:** where KitchenJam is required to process or retain information by law.
- **Legitimate interests:** where processing is necessary for KitchenJam's legitimate business or operational interests and those interests are not overridden by the individual's rights and freedoms.
- **Consent:** where an individual has freely chosen to give consent for a particular use and consent is the appropriate lawful basis.
- **Vital interests:** where information needs to be used to protect someone's life.
- **Recognised legitimate interest:** where processing is necessary for one of the recognised legitimate interests set out in UK data protection law, including certain safeguarding, emergency and crime-prevention purposes.
- Other lawful bases permitted under UK data protection law where applicable.

KitchenJam may use personal data to:

- respond to enquiries;
- arrange and provide lessons, classes, workshops and events;

- manage memberships, bookings and timetables;
- communicate with students, parents and customers;
- manage payments and financial records;
- provide appropriate support and adjustments;
- manage staff and recruitment;
- maintain the safety and security of students, staff and premises;
- meet safeguarding responsibilities;
- deal with complaints, disputes or legal claims;
- meet legal, regulatory, tax and accounting obligations; and
- send marketing communications where permitted by law.

KitchenJam will identify the appropriate lawful basis for each purpose and will not rely on consent where another basis is more appropriate.

7. Special Category and Criminal Offence Data

Some personal data requires additional protection.

Special category data can include information about a person's:

- health or disability;
- racial or ethnic origin;
- religious or philosophical beliefs;
- political opinions;
- trade union membership;
- genetic or biometric information used for identification;
- sex life; or
- sexual orientation.

Where KitchenJam processes special category data, we will identify both an appropriate lawful basis under the UK GDPR and an additional condition permitting the processing of that special category data.

Information relating to criminal convictions, offences or allegations is subject to separate protections. This may be relevant, for example, to DBS information or some safeguarding matters.

KitchenJam will only process this information where there is an appropriate legal basis and will apply additional care to its access, storage and sharing.

8. Children's Personal Data

KitchenJam regularly processes personal data relating to children and young people and recognises that this requires particular care.

We will:

- collect only information that is reasonably necessary;
- take account of the child's age, understanding and best interests;

- use clear and appropriate privacy information where information is collected directly from a child;
- restrict access to sensitive information;
- take particular care when sharing children's information; and
- consider the child's own rights and privacy as well as the role of their parent or carer.

Where safeguarding information needs to be shared, KitchenJam may share information without consent where it is lawful and necessary to protect a child or another person.

A child's data protection rights belong to the child. A parent or carer does not automatically have an unrestricted right to all personal information held about them. Where a request is made on behalf of a child, KitchenJam will consider the child's age and understanding, their best interests, their privacy, whether the child is able to exercise their own data protection rights and whether the person making the request has appropriate authority.

9. Data Sharing and Third Parties

KitchenJam will only share personal data where there is an appropriate reason to do so.

Information may be shared with:

- authorised KitchenJam staff who need access for their role;
- payment, booking, email, IT, cloud storage or other service providers;
- accountants, insurers, legal advisers and other professional advisers;
- local authorities, safeguarding agencies, police or other relevant bodies where appropriate;
- event or venue partners where necessary for an activity; and
- other organisations where required or permitted by law.

KitchenJam will not sell personal data.

Where another organisation processes personal data on KitchenJam's behalf, KitchenJam will take reasonable steps to ensure that appropriate data protection arrangements and contracts are in place where required.

Where personal data is transferred outside the UK, KitchenJam will ensure that the transfer complies with UK data protection law, including the use of adequacy regulations or appropriate safeguards and any required data protection test.

10. Data Security

KitchenJam will use appropriate technical and organisational measures to protect personal data from loss, misuse, unauthorised access, disclosure, alteration or destruction.

Depending on the systems and information involved, measures may include:

- secure passwords and authentication;
- appropriate access controls;
- limiting access according to role and need;

- secure devices and accounts;
- appropriate backup and recovery arrangements;
- secure storage of paper records;
- secure sharing and transfer methods; and
- secure deletion or disposal of information.

Staff must take reasonable care when handling personal data and must not access, copy, share or retain information unless this is necessary for their role.

11. Data Retention and Disposal

KitchenJam will not keep personal data for longer than it is reasonably needed.

Retention periods will take account of:

- the reason the information was collected;
- how long it may be needed operationally;
- legal, tax, employment or regulatory requirements;
- safeguarding requirements;
- limitation periods for potential legal claims; and
- whether there is any continuing reason to retain the information.

Where appropriate, KitchenJam will maintain standard retention periods for different categories of information and review information periodically.

When information is no longer required, it will be securely deleted, destroyed or anonymised as appropriate.

Safeguarding records may need to be retained for longer than ordinary student or customer records and will be managed in accordance with KitchenJam's Safeguarding Policy and relevant safeguarding requirements.

12. Individual Data Protection Rights

Depending on the circumstances and the lawful basis being used, individuals may have rights including:

- **the right to be informed** about how their personal data is used;
- **the right of access** to personal data held about them;
- **the right to rectification** of inaccurate or incomplete data;
- **the right to erasure** in certain circumstances;
- **the right to restrict processing** in certain circumstances;
- **the right to data portability** in certain circumstances;
- **the right to object** to certain processing; and
- rights relating to certain forms of automated decision-making.

These rights are not absolute and exemptions may apply.

Subject Access Requests

A request for access to personal data may be made verbally or in writing and does not need to use the words “subject access request”.

KitchenJam will respond without undue delay and normally within one month.

Where permitted by law, the response period may be extended by up to a further two months where a request is complex or a person has made a number of requests. The person will be informed if an extension is required.

KitchenJam may request reasonable information to confirm a person’s identity or authority to act for someone else where necessary.

Where KitchenJam holds a large amount of information about the requester and clarification is genuinely required to identify the information requested, the legal response period may be paused while clarification is awaited.

KitchenJam will carry out a reasonable and proportionate search for relevant information.

13. Data Protection by Design and Accountability

KitchenJam will consider privacy and data protection when introducing or changing systems, forms, services or ways of working.

This includes considering:

- what information actually needs to be collected;
- who needs access to it;
- how it will be secured;
- how long it should be retained;
- whether children or vulnerable individuals may be particularly affected; and
- whether the proposed use creates a high risk to individuals’ rights and freedoms.

Where processing is likely to create a high risk, KitchenJam will complete an appropriate Data Protection Impact Assessment where required.

KitchenJam will maintain appropriate records to demonstrate compliance, which may include records of processing activities, lawful bases, third-party processors, retention decisions, individual rights requests and personal data breaches.

14. Personal Data Breaches

A personal data breach can include the accidental or unlawful loss, destruction, alteration, disclosure of or access to personal data.

Examples may include:

- sending personal information to the wrong person;

- losing a device or document containing personal data;
- an account being accessed without authorisation;
- accidentally making confidential information available to others; or
- deleting or losing information that should have remained available.

Any member of staff who becomes aware of an actual or suspected personal data breach must report it to the Data Protection Lead or management **immediately**.

KitchenJam will:

- take reasonable steps to contain the breach;
- establish what has happened;
- assess the potential effect on the people involved;
- record the breach and the action taken; and
- decide whether the ICO and/or affected individuals must be notified.

All personal data breaches will be recorded, whether or not they are reportable to the ICO.

Where a breach is likely to result in a risk to individuals' rights and freedoms, KitchenJam will notify the ICO without undue delay and, where feasible, within **72 hours of becoming aware of the breach**.

Where the breach is likely to result in a **high risk** to affected individuals, those individuals will also be informed without undue delay.

15. Data Protection Complaints

Anyone who is concerned about how KitchenJam has used or handled their personal data can raise a data protection complaint with us.

Complaints can be made using the contact details at the end of this policy.

KitchenJam will:

- provide a clear way for people to make a data protection complaint;
- acknowledge receipt of a complaint within **30 days**;
- make appropriate enquiries and investigate the complaint without undue delay;
- keep the complainant appropriately informed of progress; and
- explain the outcome without undue delay.

A record of the complaint and its outcome will be maintained where appropriate.

If someone remains dissatisfied with how their personal data has been handled, they also have the right to raise the matter with the Information Commissioner's Office.

16. Training and Staff Responsibilities

Staff will receive data protection information or training appropriate to their role.

Staff must:

- handle personal information only where necessary for their work;
- keep passwords and access credentials secure;
- take reasonable care when emailing, messaging or sharing information;
- avoid unnecessary downloading or copying of personal information;
- keep confidential information private;
- report suspected data breaches promptly;
- recognise and pass on requests relating to an individual's data protection rights; and
- ask for advice where they are unsure about the appropriate use of personal information.

Data protection responsibilities will be reinforced through periodic updates where appropriate.

17. Policy Review

This policy will be reviewed at least annually and sooner where appropriate, including:

- following changes to data protection legislation or ICO guidance;
- following a significant personal data breach or complaint;
- where a change to KitchenJam's systems or activities affects how personal information is processed; or
- where experience indicates that procedures should be updated.

18. Contact Information

For questions, requests or complaints relating to personal data, contact:

Data Protection Lead: Darryl Powis

Email: darryl@kitchenjam.com

Office Address: KitchenJam, 8-10 Penny Brookes Street, London, E20 1BN

Individuals also have the right to raise data protection concerns with the **Information Commissioner's Office (ICO)**.

19. Relevant Legislation and Guidance

This policy has been prepared with regard to:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Data (Use and Access) Act 2025;
- Privacy and Electronic Communications Regulations 2003, where applicable; and
- relevant Information Commissioner's Office guidance.

